

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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S.W., by her parent and natural guardian, J.W.,  
individually and on behalf of all others similarly  
situated; A.W., by her parent and natural guardian  
A.W., individually and on behalf of all others similarly  
situated; J.F. and P. F., by their parent and natural  
guardian, A.F., individually and on behalf of all others  
similarly situated; L.T., by her parent and natural  
guardian, R.T., individually and on behalf of all  
others similarly situated,

Civ.Action No.

AFFIDAVIT

Plaintiffs,

vs.

SHEILA WARREN, sued individually, and as  
Director of Early Intervention Services for Orange County,  
ORANGE COUNTY DEPARTMENT OF HEALTH,  
COUNTY OF ORANGE,

Defendants.

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STATE OF NEW YORK    )  
                                  ) ss:  
COUNTY OF ORANGE    )

Pamela Williams DiPaolo, of fully age, under penalties of perjury, respectfully says:

1. I am a certified speech-language pathologist, having been certified by the American Speech and Hearing Association since 1977, and licensed in the State of New York since 1985.
2. In or about 1999, I began working under contract for Orange County providing speech therapy for children in the Early Intervention Program. I continued my contract with the County providing speech therapy to disabled children until approximately November 2002.

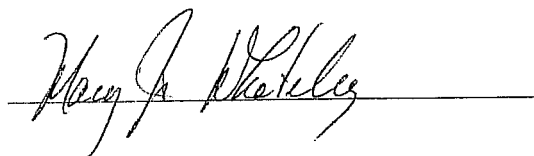
3. In or about November 2002, I heard from other therapists that the County was instituting a policy requiring therapists to carry a minimum caseload of five, and that my contract may not be renewed because I was not providing speech therapy to a minimum of 5 children.

4. I then received a letter from Orange County Early Intervention stating that my services would no longer be needed as a speech therapist. I was not offered a new contract nor a list of agencies to contact if I chose to provide services through an agency. However, I did, on my own, contact Jilly's Place. I was told at that time that they would not hire me unless I agreed to carry a minimum caseload of eight. I was unable to commit to such a caseload and, therefore, no longer provided speech therapy to children in the Orange County Early Intervention Program.

5. Should the Orange County Early Intervention program change its policy of requiring a therapist to carry a minimum caseload of five, I would consider returning to the Early Intervention Program and providing speech therapy to disabled children in Orange County.

  
Pamela Williams DiPaolo

Sworn to before me this 16<sup>th</sup> day  
of August, 2007.



MARY J. WHATELEY  
Notary Public, State of New York  
No. 4918265 *Whateley*  
Qualified in Orange County  
Commission Expires ~~May 31, 2011~~ *9/14/2011*